

MSG

UNITED STATES DISTRICT COURT

18

5096

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 2306 N. 19th St Philadelphia Pa 19121

Address of Defendant: _____

Place of Accident, Incident or Transaction: _____
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☐

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☐

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☐
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☐
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☐
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☐

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
(Please specify) STATE CREATED DANGER

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Gerald Williams Bey, counsel of record do hereby certify:
☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
☒ Relief other than monetary damages is sought.

DATE: 11-21-18

Gerald Williams Bey
Attorney at Law

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 11-21-18

Gerald Williams Bey
Attorney at Law
Pro Se Plaintiff

MSG

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM


v.

CIVIL ACTION

NO. **18 5096**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)  ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

Date

11-21-18

~~Attorney-at-law~~

Pro Se Plaintiff

~~Attorney for~~

Telephone

215-554-1386

FAX Number

E-Mail Address

nyhdearab@gmail.com

MSG

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Gerald Williams-Bey

18 5096

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Philadelphia Housing Authority;
Philadelphia Housing Authority
Police Department;
Chief Branville G. Bard Jr.
(Individually and in his official capacity)
Sgt. Glenn Eskridge
(Individually and in his official capacity);
Philadelphia Police Department 22nd District.
Vanessa C. Hall

COMPLAINT

Jury Trial: ☐ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Gerald Williams-Bey</u>
	Street Address	<u>2136 N. 19th Street</u>
	County, City	<u>Philadelphia Pa</u>
	State & Zip Code	<u>Pennsylvania, 19121</u>
	Telephone Number	<u>215-554-1386</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Philadelphia Housing Authority ^(Police)
 Street Address 3100 Penrose Ferry Road
 County, City Philadelphia, Philadelphia
 State & Zip Code Pa. 19145

Defendant No. 2

Name Philadelphia Housing Authority
 Street Address 1800 S. 32nd Street
 County, City Philadelphia, Philadelphia
 State & Zip Code Pa. 19145

Defendant No. 3

Name Branville G. Bard Jr.
 Street Address 125 6th Street
 County, City Middlesex County, Cambridge
 State & Zip Code Massachusetts, 02142

Defendant No. 4

Name Glenn Eskridge
 Street Address 3100 Pennrose Ferry Road
 County, City Philadelphia, Philadelphia
 State & Zip Code Pa. 19145

Vanessa C. Hall
1800 S. 32nd Street.
Phila. PA, 19145

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

State created danger, private
citizen under color of law -
14th Amendment

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Philadelphia,
Pennsylvania

B. What date and approximate time did the events giving rise to your claim(s) occur? Between
May of 2016 and January of 2016

C. Facts: attached on back / typed -

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

In May of 2016 Gerald Williams-Bey resided in the home he owns which is located at 2136 N. 19th Street Philadelphia, PA 19121. Gerald's spouse Jennifer Bennetch and their two young children lived with him in the home. Gerald and Jennifer are an interracial Muslim couple. Gerald and his family still live in the home.

Gerald is on Megan's Law for a sex offense from 1993.

There is an abandoned lot which is privately owned located at 2134 N. 19th Street.

Philadelphia Housing Authority owns the home located at 2132 N. 19th Street. During the time of the incidents leading to this claim a tenant named Vanessa C. Hall resided in the home with 6 of her 7 children.

In May of 2016 Vanessa C. Hall began what would become a cycle of non-stop hate based harassment (which would be supported and fueled by the Philadelphia Housing Authority and Philadelphia Housing Authority Police) against Gerald Williams-Bey and his spouse Jennifer Bennetch the harassment would culminate with Gerald being near fatally attacked.

On May 20, 2016 Gerald and his wife went to Councilwoman Jannie Blackwell's office seeking advice on dealing with the harassment. They spoke to Miss Blackwell's director of constituent services John Fenton. John asked Miss Bennetch to email him details so that he could forward the information to the Philadelphia Housing Authority. Miss Bennetch sent the email, and John Fenton emailed back stating that somebody from the Housing Authority would look into the matter.

On May 23, 2016 Miss Corolla a detective from the Philadelphia Housing Authority Police Department contacted Miss Bennetch by phone. She requested details and stated that she would look into the issue.

The harassment continued.

On the evening of June 3, 2016 Gerald was pulled over by a Philadelphia Housing Authority Police Officer (Gerald was at the time unaware that the officer was a P.H.A police officer) on non P.H.A property saying that somebody reported a (made up) domestic incident between Gerald and Jennifer.

On June 7, 2016. Miss Hall's property manager Bobby Malcolm sent a letter to Garry Williams, (Garry Williams is Gerald's alias which is used on Megan's Law) requesting our presence at a mediation on Monday June 13th, 2016 at 10:00 am.

Miss Hall seemed to become more comfortable with harassing Gerald's family after police

Philadelphia Housing Authority Maintenance vans with what Gerald later found out to be PHA police in them began sitting on the block between 5:30 am and 7:00 am (the time Gerald goes to get his coffee from the corner store) daily.

On Friday June 10, 2016 Gerald received a call from Bobby Malcolm stating that the mediation had to be rescheduled and would take place on June 15, 2016 at 1:00 pm.

On Saturday June 11, 2016 Miss Hall screamed at Jennifer from her front steps saying "hey, white girl you really want to play these games, you got way more to lose than me, you already know i'm connected."

On Sunday June 12, 2016 Gerald and his family were barbecuing, Miss Hall sat on her steps and recorded the family with her phone for hours. Her adult daughter Sade Blyden attempted to instigate a fight with Miss Bennetch.

On Monday June 13, 2016 Gerald received a call from Bobby Malcolm stating that the mediation would have to be rescheduled again, he did not have a date.

At some point Gerald and Jennifer filed a neighbor dispute complaint with the Philadelphia Commission on Human Relations.

Miss Hall continued to make religious and race based comments and told Gerald "you wanna fuck with me, you on that list i'll say you touched me or my kids."

On June 14, 2016 Gerald and Jennifer went back to city hall and spoke to John Fenton again who said he would contact P.H.A. They also went to the office of their district councilman Darrell L. Clarke where they spoke with a representative who said she would also contact P.H.A. and took their contact information. She later called them and informed them that the mediation would take place the following day.

On the evening of June 14, 2016 Gerald and Jennifer sat on their steps and let their children play. Miss Hall and her teenage son Zion Blyden came outside and started taunting Gerald and Jennifer, and calling out the children's names.

On June 15, 2016 Gerald and Jennifer attended the mediation at the office of Bobby Malcolm. Miss Hall and Zion Blyden also attended. Bobby Malcolm sat in on the mediation which was

handled by two Philadelphia Housing Authority Police Officers, Officer Hinton and Officer Maultz whom identified themselves as P.H.A.'s community relations officers.

The officers allowed Miss Hall to slander Gerald and Jennifer throughout the mediation and did not allow Gerald or Jennifer to say much at all. They concluded admitting that the mediation was useless. Officer Hinton gave Jennifer his card and told her that he wanted to follow the issue and to call him if anything occurred. The P.H.A. police officers then asked Gerald and Jennifer to leave so they could talk to their tenant.

Miss Hall went around the corner that evening and told random people from the neighborhood that Gerald was a rapist and that Gerald was gonna give their names to the cops. Gerald knew some of the people and they told him.

On June 16, 2016 Gerald and Jennifer went to the Philadelphia Housing Authority's Office of Audit and Compliance to complain about the mediation process and the tenant. They were sent to speak to P.H.A.'s director of human resources Joanne Strauss. Miss Strauss connected them to Branville Bard Jr. the Chief of the Philadelphia Housing Authority's Police Department. Chief Bard set up a meeting with the family for the next day.

Gerald and Jennifer met with Chief Bard at the P.H.A Police Station on Friday June 17, 2016. Chief Bard was with a P.H.A Police Inspector William Britt whom Gerald recognized as one of the men from the vans that would sit outside his home early in the morning. Chief Bard informed Gerald and Jennifer that he used to be Captain of their Police District. He would go on to use his relationship with 22nd District Officer's to assure that they did not intervene in the situation between the tenant and Gerald Williams-Bey. Chief Bard told the family he was going to have his Detective Sgt. Glenn Eskridge look into the matter.

He never informed Gerald and Jennifer that P.H.A Police only have jurisdiction in and on the grounds and the buildings of the P.H.A and he never referred them to City police or agencies. Although Gerald and Jennifer were homeowners and not tenants of the P.H.A. Everybody in P.H.A worked hard to keep the issue private and internal from the very beginning.

On the Morning of Monday June 17, 2016 Sgt. Eskridge called Jennifer and asked if he could meet with her and Gerald at her home that afternoon. She agreed. Sgt. Eskridge asked Gerald if he thought about moving and told Gerald that they were giving good money for the homes around here. Sgt. Eskridge and another P.H.A Police Officer met with the family at home and told them he would be conducting an investigation. Gerald and Jennifer believed this to be a good thing they were unaware that the investigation would be used to prevent them from utilizing Philadelphia Police and city services and to protect Miss Hall from being held

accountable for her actions which would fuel her fire and create the monster she would eventually become.

After the investigation was opened Miss Hall became confident and relentless in harrasing Gerald and Jennifer. She would come outside and threaten or instigate Gerald and Jennifer and have P.H.A Police already on their way or she would just randomly call P.H.A Police and they would jump out of their cars and immediately yell at and threaten to arrest Gerald and Jennifer without even looking into the issue. Gerald and Jennifer have multiple videos to show this behavior.

Neighbors would tell Gerald and Jennifer that the Police were turning on their door handle or going in there back yard while they were not home. The family would call their police district to be told that no officers had been at their home. P.H.A Police vehicles and uniforms are strikingly similar to Philadelphia Police vehicles and uniforms.

Gerald and Jennifer went to the 22nd District of the Philadelphia Police Department and were told that they had to contact P.H.A Police because of the investigation. They informed the Philadelphia Police that they were not tenants of the P.H.A but they were still refused services.

On July 1, 2016 Miss Hall had her ex boyfriend approach Gerald in front of his home. The same day P.H.A Police approached Gerald and asked him if he "threatened the man from over there." He tried to explain to them that the man approached him on his own property the P.H.A Police told him to go in the house and he won't have to worry about stuff like that.

The harrassment from Miss Hall and the P.H.A. Police continued. There were at least two incidents per week. Jennifer communicated with Chief Bard through email the whole time and Eskridge continued blocking Gerald and Jennifer from seeking justice thus building Miss Hall's confidence.

In late July Miss Hall's juvenile and adult son came pounding on our door the adult saying that his mom said we gave his name to the cops (we didn't know his name). He was trying to fight Gerald and threatening to kill us. The incident is on video. P.H.A Police responded to the incident and did nothing.

A few days after that Miss Hall hung a newsletter on the front of her home that said this is the year of jubilee and something about defeating enemies in the name of Jesus. Jennifer took a photo. The next morning Gerald and Jennifer found human feces smeared into their wall with a pile of feces and a feces smeared rag on the ground. Photos do exist. They drove to the P.H.A Police Station where they spoke to Sgt. Eskridge. Sgt. Eskridge said we couldn't be sure it was

her so he couldn't do anything. They left stopped at a store and went home. When they arrived at home Miss Hall began taunting them. She said "oh you went to Eskridge you mad as shit ain't you". Jennifer started recording her she said "oh yal Muslim I don't like yall people anyway." She said she was going to call child services and get their kids taken. Miss Hall's adult daughter said she wanted to taste Jennifer's blood and taunted Gerald and Jennifer's children. P.H.A Police showed up and as usual treated Gerald and Jennifer like criminals though they had video and another neighbor saying that Miss Hall was the aggressor.

Gerald went to the Philadelphia District Attorney's Office Private Criminal Complaint Unit where he was told that he had to contact P.H.A Police.

Gerald and Jennifer left the Private Criminal Complaint Unit and went to Jannie Blackwell's Office to talk to John Fenton. John Fenton viewed the video and agreed that the situation was getting out of control. He contacted P.H.A and the Philadelphia Police. He set up for us to meet with Shanna Moore the Community Relations Officer for the 22nd Police District.

Gerald and Jennifer met with Shanna and her partner at the police station. Shanna informed us that Chief Bard was the one that promoted her before he left and that she loved Chief Bard. She told us that there wasn't much she could do because P.H.A Police were handling the matter.

Gerald and Jennifer attempted to call 911 multiple times and P.H.A. Police responded everytime.

Gerald and Jennifer started communicating with Andre Sawyer from Councilwoman Cindy Bass's office.

Once in early August and once in mid August of 2016 Gerald and Jennifer went back to P.H.A's Office of Audit and Compliance to complain about the actions of the P.H.A Police where they were met with aggression by the P.H.A Police Officer who stood guard at the entry to the unit. On the first trip they were eventually permitted to speak to somebody from the unit but the representative would only take a complaint about the tenant and not the Police. The second time they went the P.H.A Police Officer refused to allow them to speak to anybody and ordered us to leave the office.

In mid August Gerald and Jennifer came home to have lunch after having been gone for hours. They pulled on their block to find Miss Hall out front of her home with P.H.A Police. The officer approached Gerald and Jennifer aggressively saying they damaged Miss Hall's property. Gerald and Jennifer drive to the PHA Police station to complain, Sgt. Eskridge was out of the office so a Lieutenant came to speak to them. Lieutenant Hakim Dunbar introduced himself and Gerald and

Jennifer recognized him as an individual that had previously went to Miss Hall's house as a maintenance man. He told them there was nothing he could do and if they wanted the names of the officers that approached them they would have to file a right to know request.

Gerald and Jennifer went back to John Fenton's office he said he did not know what to do at this time.

Throughout the month of August Miss Hall and the P.H.A Police continued to harass Gerald and Jennifer relentlessly. On August 24, 2016 another feces incident occurred and Gerald and Jennifer went to the P.H.A Police station. The officer at the front desk was very angry and aggressive saying "leave the building" and "what makes you think you can come in here anytime you need help?" Gerald said that he needed to talk to somebody because this was the only place we could go. The officer came from behind the desk and got toe to toe with Gerald, Sgt. Eskridge happened to come in Gerald turned around and said "oh that's who I wanted to see." As Gerald turned around the officer pushed him and said "yo Mama's a chump and yo daddy is too." The incident is on video. Gerald and Jennifer talked to Eskridge and left. Gerald and Jennifer went to file a complaint at Audit and Compliance, the complaint would not be looked into until January.

September continued on with non stop harassment from Miss Hall and the P.H.A Police. We continued to be denied services by Philadelphia Police and the Philadelphia District Attorney's Office on account of the P.H.A Police investigation.

The harassment escalated in October of 2016. Miss Hall began testing how much she could get away with going further each time.

On October 5, 2016 Miss Hall's ex husband and children's father showed up at Gerald and Jennifer's front door yelling that they must "stop fucking with his kids" and threatening them (on video). Gerald and Jennifer were confused and went back into their home. They noticed flashing lights and went outside to find Miss Hall reporting to P.H.A. Police that Gerald had threatened her ex husband. Jennifer tried to speak to one of the officers and tell them that they had video of the man at their door threatening them. The P.H.A Police told Gerald and Jennifer to shut up and go in their house.

The P.H.A Police left and the ex husband left. Gerald and Jennifer were out front talking to a friend the friend left and Gerald and Jennifer sat on their steps. The ex husband returned and pulled up in front of the lot in between the two houses. He was making threats from his vehicle. Gerald stood up and went on the sidewalk to take a photo of his license plate. He rode up on the sidewalk in attempts to run Gerald over. Jennifer called 911. P.H.A. Police officer's showed up and went straight to Miss Hall's house. Jennifer said "I'm not in P.H.A. and I called 911. The

P.H.A Police officer said "We are 911". They had an ambulance pick the ex husband up. It was like the first episode of the night was a test run for Miss Hall to show her husband that the P.H.A. Police were going to protect her and she could do almost anything she wanted to Gerald and Jennifer.

Jennifer emailed Chief Bard and requested that he take her family out of P.H.A.'s vice and allow the Philadelphia Police to handle the issue.

She attempted to cut the family's water off from outside the home.

She was making multiple false reports of domestic violence as if she was Jennifer.

She assumed she had succeeded in cutting the water off and called Philadelphia D.H.S on the family.

She began telling people including the P.H.A. Police that Gerald and Jennifer followed her daughter to school. The P.H.A. Police said they knew it wasn't true so they were not even going to look into it.

November continued on the same way. Still being harassed still under P.H.A. Police terror. Miss Hall started to become really frustrated and aggressive.

On November 24, 2016 Gerald and Jennifer came home from Jennifer's mom's house in the evening and sat on their steps. Miss Hall's Juvenile son came out and said "yo you fucked with my mom's car?" (Gerald and Jennifer had been gone since the night before.) Miss Hall's adult son Abdul then came out and started approaching Gerald. They ended up jumping and stabbing Gerald for 8 and a half minutes and entering his home. Neighbors who were also tenants of the P.H.A witnessed the attack and even intervened. He had a terrible concussion to get multiple stitches and staples, and a broken finger which required surgery and is now paralyzed. P.H.A Police and the Philadelphia District Attorney's Office have full video of the attack.

Jennifer called 911 during the attack as did one of the neighbors. P.H.A Police showed up as Abdul was charging at Gerald for a fourth attack after the neighbor intervened. Jennifer asked dispatch to send a Philadelphia Police. Miss Hall asked them to lock Gerald up. Gerald was stumbling and leaking blood the P.H.A. Police went straight to Miss Hall. Miss Hall asked them to lock Gerald up Abdul kept saying "he a scraper, he a scraper." Abdul was still holding a knife and him and Zion had Gerald's blood on their clothes. The P.H.A. Police told Gerald's friends and the neighbors and Jennifer to mind their fucking business. An ambulance came for Gerald.

The P.H.A Police took Miss Hall and her children into the home and closed the door behind them. They never spoke to Gerald or Jennifer and police never came to the houspital.

Gerald went to the Philadelphia Police station after being released from the hospital. They said they were busy and told him to call the Central Detectives Division. He called the division and was assigned to a detective Richard Bova. Richard Bova told Gerald he had to come down to the station to speak with him. Gerald was severely injured but had to go to the Central Detectives Division to make a report. Bova would not contact P.H.A or P.H.A. Police to identify the attackers by name and he would not go to the home, he instead said that if Gerald see's either of his attackers outside to call 911 and identify them so they will be arrested.

Jennifer emailed Chief Bard about the attack. He emailed back within minutes and said he would call her on Monday.

The Monday following the attack Gerald and Jennifer went to City Hall seeking help with the issue. John Fenton sais Gerald should start carrying something and he didn't know what else to do. Andre Sawter gave them a number for Inspector Dale a Philadelphia Police Inspector. Gerald and Jennifer went to Councilman at large William Greenlee's office and met his director of constituent services Julie O' Connell. They explained the situation to her. Julie contact P.H.A Police they told her they couldn't discuss the issue because of the ongoing investigation Julie told them that they needed to immediately remand jurisdiction to the Philadelphia.

Gerald and Jennifer left City Hall. Gerald got really dizzy and rested in front of McDonald's on Broad and Arch Streets. Miss Hall's adult son stuck his head out the door of McDonalds and laughed condescendingly at Gerald. Jennifer told Sheriff's Deputies the man was wanted for stabbing her husband and she called 911. The police came and went into McDonald's and arrested him. They brought him out with handcuff's on, he was laughing and told the police officer "you can't book me, this a P.H.A case.". He was arrested and charged.

The Tuesday following the attack Miss Hall saw Gerald talking to the other neighbors. She became irate and called P.H.A Police on her phine and said "the people from 2138 are getting into it now" and "he just threatened my son" P.H.A. Police arrived and screamed at Gerald that he better leave them people alone. Gerald told them her son was wanted for attacking him they said they didn't have anything to do with that.

Throughout the month of December Miss Hall and the P.H.A Police continued to harass Gerald and Jennifer. The juvenile son wanted for the attack continued to have solace in the P.H.A home.

Jennifer and Gerald have multiple video's of the P.H.A. Police harassing them for Miss Hall after Gerald was attacked.

On December 25, 2016 Miss Hall's juvenile son came outside and sat on his front steps. Gerald called 911 and said that the man wanted for stabbing him was outside. The Philadelphia Police came and approached the young man. The Police allowed him to call his mother. Somebody contacted the Philadelphia Police Officers and they were told to take his information down and let him go.

He was permitted to turn himself in. Jennifer has emails from the Philadelphia District Attorney's Office saying that P.H.A Police contacted them because they were the first responders to the crime, however when the cases entered court the District Attorney's said there was no record of any police responding to the incident.

Miss Hall continued to harass Gerald and Jennifer and the P.H.A. police continued to harass the family at least a couple times a week.

Jennifer emailed HUD OIG. Miss Hall was moved in January of 2017.

Miss Hall continues to reside in a P.H.A. home with zero consequence and continued to harass the family months after she moved.

P.H.A's Office of Audit and Compliance sent a letter to Miss Bennetch stating they would not investigate any complaints about P.H.A. Police from her or Gerald.

P.H.A Police engage in a pattern of placing themselves in the middle of issues between tenants and homeowners.

P.H.A. police continue to harass the family to this day.

The case meets the test for State Created Danger because;
The harm ultimately caused was foreseeable and direct, Jennifer has emails telling P.H.A Police that Miss Hall becomes more confident with each act that P.H.A. Police support her getting away with. Everybody was waiting for somebody to get hurt.

The state acted in willful disregard for the safety of the plaintiff, P.H.A. Police continually supported Miss Hall in harassing Gerald and Jennifer they assured that she would not be held accountable and made it clear that they did not have any concern for Gerald and Jennifer. They continued to show willful disregard even after the attack and assisted in attempting to cover up

the crime and offered solace to the juvenile attacker and continued to harass Gerald and Jennifer for Miss Hall.

There existed some kind of relationship between the state and the plaintiff, Gerald had been in contact with P.H.A. police since May of 2016. P.H.A. maintained an ongoing investigation which prevented Gerald from utilizing the city police thus rendering him helpless outside of them.

The state actors used there authority to create an opportunity that otherwise would not have existed for the third parties crime to occur, P.H.A Police assisted Miss Hall and her family in getting away crimes against Gerald and Jennifer multiple times. P.H.A Police created an environment where Miss Hall and her children were confident that they could harm Gerald and not be held accountable. P.H.A. Police did not simply not assist Gerald they placed the Gerald in a position where he had no one to turn to but P.H.A. Police and then they demonstrated numerous time that they would protect Miss Hall and her family from being held accountable for any act she committed against Gerald.

Gerald is now in a position where he feels that the law is useless to him and he lives under constant stress and anxiety.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Concussion, large head wounds that required stitches and staples, loss of consciousness, infected bite wound, broken finger that required surgery and is now paralyzed - required a P.T.P Fusion and Physical Therapy, bite wound that became infected -

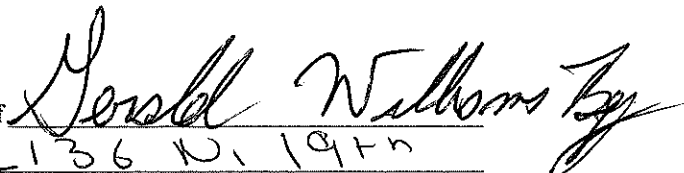
V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

\$50,000 for intentional infliction of emotional distress, \$50,000 for the continual harassment by P.H.A Police, \$500,000 for the injuries and permanent injury, 200,000 for pain and suffering, for the court to order P.H.A to create and use distinctively marked vehicles and uniforms, for the court to order P.H.A to create ~~policy~~ and enforce policies to ensure that P.H.A Police remain in their jurisdictions, and that there be a clear ^{and enforce} course of action for citizens affected by P.H.A Police - \$25,000 for assault and battery

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21 day of November, 2018.

Signature of Plaintiff 
Mailing Address 2136 W. 19th
Street, Philadelphia
PA, 19121
Telephone Number 215-554-1386
Fax Number (if you have one) _____
E-mail Address nyhdearrah@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this ~~_____~~, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____
Inmate Number _____

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21 day of November, 2018.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

Yoseld Williams Esq.

2136 N. 19th
Street. Philadelphia
PA 19121

215-554-1386

nyhdearab@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this ~~11/27/18~~, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____